

JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001.2113
TELEPHONE: +1.202.879.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 879-3630
BOLCOTT@JONESDAY.COM

November 5, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Written Ex Parte Letter, WT Docket No. 10-4

Dear Ms. Dortch:

Surecall continues to urge the Commission to act expeditiously in adopting an order that removes the personal use restriction for wideband Consumer Signal Boosters. The near-unanimous record in this proceeding strongly supports the repeal of the personal use restriction to ensure that small businesses, entrepreneurs, and commercial entities (hereinafter “Enterprise Users”) have uninterrupted access to wireless communications service to support their customers and their internal operations.

A significant point of discussion during the comment process for the removal of the personal use restriction was the manner in which Enterprise Users would notify wireless carriers regarding their installation and use of wideband signal boosters. Most commenters favored a centralized registration database, but there was no consensus on who should set up and run it. In contrast, the NPRM proposed that Enterprise Users of wideband signal boosters be required to register the signal booster with the operator of each wireless network on which the booster will operate in that location.¹

Surecall was initially concerned about the administrative burden that such a multi-carrier registration process might impose on Enterprise Users of wideband signal boosters. However, based on subsequent discussions with Surecall’s distributors and potential Enterprise Users of wideband signal boosters, Surecall now believes that a multi-carrier registration process would be viewed by Enterprise Users as minimally inconvenient. Further, Enterprise Users, which by

¹ Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission’s Rules to Improve Wireless Coverage Through the Use of Signal Boosters, *Second Report and Order and Second Further Notice of Proposed Rulemaking*, WT Docket No. 10-4, FCC 18-35, ¶ 47 (March 23, 2018).

Marlene H. Dortch
November 5, 2018
Page 2

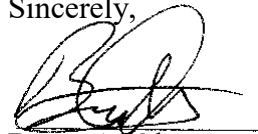
nature are risk adverse, are likely to comply with a multi-carrier registration process even if it entails submitting essentially the same information on four or more carrier websites.

If the Commission adopts a multi-carrier registration requirement for Enterprise Users of wideband signal boosters, Surecall would encourage its enterprise customers and product distributors to comply with the registration requirement. Surecall would also assist its customers and distributors in the registration process, including, for example, providing them with instructions and internet links for the registration sites maintained by the carriers. If requested by one of its customers, Surecall would also be willing to complete the registration process for a wideband signal booster on the customer's behalf.

Surecall therefore urges the Commission to move forward with the adoption of its original proposal to require Enterprise Users of wideband signal boosters to register the booster with each wireless carrier serving that area regardless of whether the Enterprise User has a subscriber relationship with the carrier. Such an approach, combined with the highly successful Network Protection Standard previously adopted by the Commission, would ensure that Enterprise Users, their customers and their employees would have reliable access to wireless communications services inside enterprise establishments while continuing to ensure that harmful interference does not result to wireless networks.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", written over a horizontal line.

Bruce A. Olcott
Counsel to Surecall